

fisheries, wetland info and thoughts from the CSC tech assist notes

Sabrina Forrest to: Barry_Hayhurst

06/16/2011 02:23 PM

From: Sabrina Forrest/R8/USEPA/US
To: Barry_Hayhurst@urscorp.com
Cc: Megan_Adamczyk@URSCorp.com

Barry, I will forward the Kay Zillich (BLM) and Rod Chimner (Univ. of Michigan wetland expert) emails. I don't recall exactly what they said, so you may need to follow up with Dr. Chimner to see if the sphagnum moss is in areas that are contiguous with Cement Creek.

You may already have this, but here is the USFWS wetland codes 2 pager at:
http://www.fws.gov/wetlands/_documents/gNSDI/WetlandsDeepwaterHabitatsClassification.pdf

Important things to follow up on:

See pg 2 para 3 of CSC comments with regard to observed release by direct observation that is strengthened by data - Look for logbook documentation and photographs that indicate Megan, Bryan others actually saw waste rock/tailings materials in the creek and where.

Please make sure the source volumes Megan reported are correct and document where those volumes came from. This is hugely important for keeping the waste characteristics factor value up there at 1000.

Review the HRS definition of wetland and requirements for a "wetland expert." Also determine how we will get our delineation verification done by a "wetland expert." Also look for and document other sensitive environments (T&E species in the wetlands that are contiguous with our SW pathway).

I have sent another email to the CDOW contacts to see if they can document the declines in fishery productivity being attributable to the untreated mine sources - will see if I get anything back.

For CSC's Site Definition section, they indicate a case for the site being a larger portion of Cement Creek, not just the upstream sources. If we determine we should go this route, you will need to confirm releases in CC are due to mining of one single ore body. I would put this on the back burner for now, as it seems our Quickscore is focusing on upper Cement Creek sources as being the "Site," but we may need to keep open to this possibility.

Sincerely,

Sabrina Forrest
NPL Coordinator &
Site Assessment Manager
U.S. Environmental Protection Agency
1595 Wynkoop Street, Mail Code: 8EPR-B
Denver, CO 80202-1129
Direct Ph: 303-312-6484
Toll Free: 1 800-227-8917, 312-6484
Fax: 303-312-6065
Agency Cell: 303-589-1286

E-mail: forrest.sabrina@epa.gov

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